

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

KEITH COLE, JACKIE BRANNUM, RICHARD §  
KING, MICHAEL DENTON, FRED WALLACE, §  
and MARVIN RAY YATES, individually and on §  
behalf of those similarly situated, §

Plaintiffs, §

v. §

BRYAN COLLIER, in his official capacity, §  
ROBERTO HERRERA, in his official capacity, and §  
TEXAS DEPARTMENT OF CRIMINAL JUSTICE, §

Defendants. §

CIVIL ACTION NO.  
4:14-cv-1698

**PLAINTIFFS' MOTION FOR CONTEMPT, TO SHOW CAUSE & SANCTIONS**

## **Exhibit 3**

### **Declaration of G. Click**

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Declaration of Gary Click

DECLARATION OF GARY CLICK

1. My name is GARY CLICK.
2. My date of birth is 4/6/1964.
3. My TDCJ number is 1994731.
4. I ~~have been an inmate in the Texas Department of Criminal Justice (TDCJ)'s Wallace Pack Unit in Grimes County, Texas since~~ 7.
5. I am assigned to the Stiles Unit at 12-D-3-15.
6. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated herein are within my knowledge and are true and correct.

GDC • AT THE STILES UNIT, THE AIR CONDITIONING HAS  
NOT BEEN WORKING IN MY HOUSING AREA DURING SEVERAL  
DAYS, INCLUDING JULY 9 AND JULY 16, 2019.

GDC • IN MY HOUSING AREA AT THE STILES UNIT, I HAVE FELT  
SO HOT THAT I WORRIED I WOULD PASS OUT.

GDC • I AM NOT PERMITTED TO TAKE COLD SHOWERS AT  
THE STILES UNIT.



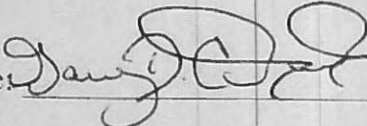
GDC - I HAVE ONLY LIMITED ACCESS TO ICE WATER. IN THE  
DAYROOM, A COOLER IS FILLED WITH ICE AT MOST TWO  
TIMES PER DAY. IN MY CELL, I AM NOT PERMITTED ~~HE~~ TO  
ACCESS ICE WATER.

GDC • I HAVE COPD.

GDC • I HAVE BEEN DENIED RESPITE WHEN I REQUEST IT  
IN MY HOUSING AREA.



Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Signature:  Dated: 7-18-19

Printed Name: Gary J. Click